

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2019-226-E
DOCKET NO. 2021-9-E

IN RE:)	
Integrated Resource Plan 2021 Update –)	PETITION TO INTERVENE
South Carolina Energy Freedom Act)	
(House Bill 3659) Proceeding Related)	
to S.C. Code Ann. Section 58-37-40 and)	
Integrated Resource Plans for Dominion)	
Energy South Carolina, Incorporated)	

Docket 2021-9-E.

The Commission staff opened this Docket, because this Commission ordered that a Docket be established to allow Dominion Energy South Carolina, Incorporated, (“DESC”) and any interested parties to advise this Commission on an appropriate procedural schedule, along with any statutory or regulatory deadlines, that needed to be addressed.

Docket 2019-226-E.

This Commission established Commission Docket 2019-226-E, on June 13, 2019, for this Commission to establish DESC’s Integrated Resource Plan, (“IRP”) pursuant to S.C. Code Ann., Section 58-37-40. By Order No. 2021-429, dated June 18, 2021, this Commission ordered DESC to file its 2021 Update to its IRP, within 60-days of the date of that Order. Thereafter, DESC filed its 2021 IRP update on August 17, 2021.

Directive Order.

Thereafter, this Commission issued its Directive Order No. 2021-588, dated August 25, 2021, consolidating Dockets 2021-9-E and 2019-226-E.

PETITIONER

Petitioner herein is the Carolinas Clean Energy Business Association, (“CCEBA” or “Petitioner”). This Petition to Intervene is filed pursuant to R. 103-825, of this Commission’s Rules and Regulations and other applicable Rules and Regulations of this Commission, and Petitioner seeks permission to intervene and be made a party of record in the above-referenced Docket, with full rights of participation.

1. CCEBA is a Mutual Benefit Corporation, incorporated in the State of North Carolina and domesticated to conduct business in the State of South Carolina by the South Carolina Secretary of State’s office.

2. CCEBA is organized for the purpose of promoting and advocating public policy positions supportive of solar power generation in North and South Carolina. CCEBA is a 501(c)(6) organization representing all types of businesses in the clean energy sector, including developers, manufacturing, engineering, construction, professional and financial services, and non-energy businesses wishing to purchase clean energy. With over 50 members, including most of the utility-scale solar developers in North and South Carolina, CCEBA monitors and participates in energy policymaking in both Carolinas. CCEBA has appeared as an intervenor in multiple dockets in North Carolina under its prior name: North Carolina Clean Energy Business Alliance. In South Carolina, CCEBA has assumed the role previously filled by the South Carolina Solar Business Alliance (“SCSBA”).

3. Specifically, CCEBA is a successor in interest for the SCSBA. CCEBA has previously been substituted as a Party in Interest in over two dozen Commission Dockets, by Commission Order No. 2021-167, dated March 10, 2021, and this Commission has subsequently approved CCEBA’s participation in Docket, 2019-226-E, (substituted by this Commission for the South Carolina Solar Business Alliance). This Commission has also approved CCEBA’s intervention in Dockets 2021-88-E, 2021-89-E, 2021-90-E, 2021-93-E and 2021-192-E.

4. CCEBA’s position is that CCEBA has substantial and specific economic interests in renewable energy in South Carolina and this Commission’s actions thereon.

5. Factually, CCEBA will be directly and substantially affected by the outcome of this proceeding and CCEBA’s business interests will be directly and financially impacted by this Commission’s resolution of the subject matter of this Docket.

6. The specific ground for this Petition is that CCEBA participated in DESC’s 2020 IRP Docket 2019-226-E, and the outcome of these consolidated Dockets affects vital business interests of CCEBA.

7. Petitioner’s interests cannot be adequately addressed by any other party. Petitioner’s Intervention will aid this Commission, by assisting in the development of a full and fair record to address the important decision to be made in this Docket.

8. Petitioner should be allowed to intervene in this Docket, with full rights of cross-examination, discovery, and participation in any Hearing to be scheduled in this Docket.

9. The granting of CCEBA's Petition to Intervene is (i) in the public interest and (ii) consistent with the policies of this Commission in encouraging maximum public participation in issues before it and intervention should be allowed so that a full and complete record addressing its views and concerns can be developed.

10. This Petition to Intervene is timely filed with this Commission.

11. CCEBA is represented by counsel in this proceeding:

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WHEREFORE, Petitioner prays for the following relief:

(a) That this Petition to Intervene be accepted and that Petitioner be made a party of record in these consolidated Dockets;

(b) That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and

(c) For such other and further relief as this Commission may deem just and proper.

Respectfully Submitted,

/s/Richard L. Whitt

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*As Counsel for Petitioner, Carolinas Clean Energy
Business Association.*

August 31, 2021